

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )

Amendment of Parts 21 and 74 to Enhance )  
the Ability of Multipoint Distribution Service )  
and Instructional Fixed Television Fixed )  
Service Licensees to Engage in Fixed )  
Two-Way Transmissions )

File No. RM-9060

## MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission's Rules, Trans Video Communications, Inc. ("TVC"), by its undersigned attorneys, hereby requests an extension of time to file comments and reply comments on the above-captioned Petition for Rulemaking. For the reasons set forth below, TVC requests that the Commission extend the time for filing comments until May 28, 1997, and for reply comments until June 11, 1997.

TVC is a wholly-owned subsidiary corporation of the Roman Catholic Diocese of Brooklyn. Either TVC or the Diocese has been authorized to provide Instructional Television Fixed Service ("ITFS") in the Boroughs of Brooklyn and Queens for nearly 30 years. During this time, TVC has been transmitting instructional programming to over 200 schools within the Diocese and has operated its ITFS stations to make substantial contributions to the educational and cultural life of its authorized service areas. TVC has also entered into an excess capacity lease agreement with CAI Wireless Systems, Inc. Accordingly, it has a substantial interest in the rules and policies proposed in the Petition.

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On March 31, 1997, the Commission released a Public Notice establishing a pleading cycle for comments on the above-referenced Petition. This pleading cycle provides interested parties only 30 days, until April 30, 1997, to prepare comments. Given the complexity and significance of the proposals in this Petition, TVC requests that the Commission grant an extension of time so that comments are due on May 28, 1997 and reply comments are due on June 11, 1997.

This extension of time is warranted for two independent reasons. First, the Petition presents a series of exceedingly complex and intricate proposals affecting MDS and ITFS. The 30-day time period for filing comments simply does not provide sufficient time for interested parties to evaluate these proposals and to understand fully their impact, much less to prepare comments commensurate with the complexity and significance of the proposals.

Second, the proposals in the Petition recommend a radical restructuring of the Commission's MDS and ITFS services. This restructuring extends to all aspects of these services, including the processing of applications, the procedures for evaluating harmful interference, the nature of protected service areas, and the services which can be provided by licensed stations. Although it is too early to comment on the merits of these proposals, it is obvious that such far-reaching proposals require more than 30 days to analyze and evaluate and to prepare comments.

Given the complexity and scope of the proposals, this extension of time is comparatively brief. Moreover, the extension will provide interested parties with

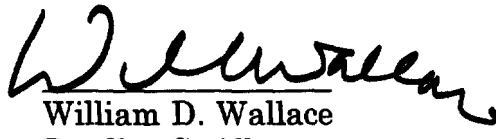
an opportunity to prepare comments which are more useful to the Commission's Staff regarding how licensees view the proposed changes in the services.

Counsel for TVC has informed counsel for petitioners that this motion is being filed. Counsel for TVC has also informed Commission Staff in the Mass Media Bureau of the filing of this request.

Accordingly, TVC respectfully requests that the Commission grant an extension of time for filing comments until May 28, 1997, and reply comments until June 11, 1997.

Respectfully submitted,

TRANS VIDEO COMMUNICATIONS, INC.

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Date: April 23, 1997

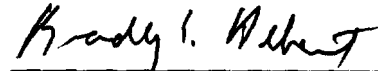
CERTIFICATE OF SERVICE

I hereby certify that, on the 23rd of April, 1997, I caused a copy of the foregoing Motion for Extension of Time to be served, via hand delivery on the following:

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